

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

FLASHPOINT TECHNOLOGY, INC.,

Plaintiff,

V.

APITEK, INC., ARGUS CAMERA CO., LLC,  
BUSHNELL INC., DXG TECHNOLOGY (U.S.A.)  
INC., DXG TECHNOLOGY CORP., GENERAL  
ELECTRIC CO., LEICA CAMERA AG, LEICA  
CAMERA INC., MINOX GMBH, MINOX USA, INC.,  
MUSTEK, INC. USA, MUSTEK, INC., OREGON  
SCIENTIFIC, INC., POLAROID CORP., RITZ  
INTERACTIVE, INC., RITZ CAMERA CENTERS,  
INC., SAKAR INTERNATIONAL, INC., D/B/A  
DIGITAL CONCEPTS, TABATA U.S.A., INC., D/B/A  
SEA & SEA, TARGET CORP., VISTAQUEST CORP.,  
VUPOINT SOLUTIONS, INC., WALGREEN CO., and  
WAL-MART STORES, INC.,

## Defendants

C.A. No. 08-139-GMS

## JURY TRIAL DEMANDED

**PLAINTIFF’S REPLY TO THE COUNTERCLAIMS OF  
SAKAR INTERNATIONAL, INC., D/B/A/ DIGITAL CONCEPTS**

Plaintiff FlashPoint Technology, Inc. (“FlashPoint”) hereby responds to each paragraph of the Counterclaims of Sakar International, Inc., d/b/a Digital Concepts (“Sakar”), as follows:

## NATURE AND BASIS OF ACTION

1. Admitted.

## PARTIES

2. Admitted.
3. Admitted.

**JURISDICTION AND VENUE**

4. Admitted that this purports to be an action for declaratory judgment of non-infringement and invalidity of U.S. Patent Nos. 6,118,480, 6,177,956, 6,222,538, 6,223,190, 6,249,316, 6,486,914, and 6,504,575, and that this Court has subject matter jurisdiction over these claims pursuant to 28 U.S.C. §§ 1131, 1338(a), 2201, and 2202, but otherwise denied.

5. Admitted.

**GENERAL ALLEGATIONS**

6. Denied.

7. Denied.

**FIRST COUNTERCLAIM**

8. FlashPoint incorporates the replies set forth to Paragraphs 1-7 as if fully set forth herein.

9. Denied.

10. Denied.

**SECOND COUNTERCLAIM**

11. FlashPoint incorporates the replies set forth to Paragraphs 1-10 as if fully set forth herein.

12. Denied.

13. Denied.

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Dated: April 17, 2008

/s/ Evan O. Williford

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**CERTIFICATE OF SERVICE**

I, Evan O. Williford, hereby certify that on April 17, 2008, I caused to be electronically filed a true and correct copy of the foregoing document – **Plaintiff's Reply to the Counterclaims of Sakar International, Inc., d/b/a Digital Concepts** – with the Clerk of Court using CM/ECF which will send notification of such filing to the following local counsel for defendants:

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I further certify that on April 17, 2008, I caused a copy of the foregoing document to be served on the following defendants by First Class Mail:

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/s/ Evan O. Williford  
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